

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA

v.

DARYN BARSALOU,  
Defendant.

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Docket No. 2:24-mj-00132

**MOTION FOR DETENTION**

NOW COMES the United States of America, by and through its attorney, Nikolas P. Kerest, United States Attorney for the District of Vermont, and moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. This defendant is eligible for detention because the case involves a crime of violence and a felony offense involving the possession of a firearm. *See* 18 U.S.C. §§ 3142(f)(1)(A), (f)(1)(E).

2. Reason for Detention. The Court should detain the defendant because there are no conditions of release that will reasonably assure the safety of any other person and the community, and the defendant's appearance in Court as required.

3. Rebuttable Presumption. The United States will not invoke the rebuttable presumption against the defendant under § 3142(e). No rebuttable presumption applies in this matter.

4. Time for Detention Hearing. The United States requests a three-day continuance of the detention hearing, pursuant to 18 U.S.C. § 3142(f). Before that hearing, the government expects to supplement this motion to further describe the reasons why detention is appropriate in this case.

Dated at Burlington, in the District of Vermont, December 4, 2024.

Respectfully submitted,

NIKOLAS P. KEREST  
United States Attorney

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